

1 E. MARTIN ESTRADA  
United States Attorney  
2 MACK E. JENKINS  
Assistant United States Attorney  
3 Chief, Criminal Division  
VALERIE MAKAREWICZ (Cal. Bar No. 229637)  
4 Assistant United States Attorney  
Major Frauds Section  
5 1100 United States Courthouse  
312 North Spring Street  
6 Los Angeles, California 90012  
Telephone: (213) 894-0756  
7 Facsimile: (213) 894-6269  
E-mail: Valerie.Makarewicz@usdoj.gov

8 AMANDA LISKAMM  
9 Director, Consumer Protection Branch  
MANU J. SEBASTIAN  
10 Trial Attorney  
Consumer Protection Branch  
11 U.S. Department of Justice  
450 Fifth Street NW, Suite 6400  
12 Washington, DC 20001  
Telephone: (202) 514-0515  
13 Facsimile: (202) 514-8742  
E-mail: Manu.J.Sebastian@usdoj.gov

14 Attorneys for Plaintiff  
15 UNITED STATES OF AMERICA

16 UNITED STATES DISTRICT COURT

17 FOR THE CENTRAL DISTRICT OF CALIFORNIA

18 UNITED STATES OF AMERICA,  
19 Plaintiff,  
20 v.  
21 JASON EDWARD THOMAS CARDIFF,  
22 Defendant.

No. 23-CR-00021-JGB

STIPULATION REGARDING REQUEST FOR  
(1) CONTINUANCE OF TRIAL DATE AND  
(2) FINDINGS OF EXCLUDABLE TIME  
PERIODS PURSUANT TO SPEEDY TRIAL  
ACT

CURRENT TRIAL DATE: 4/23/24  
PROPOSED TRIAL DATE: 6/11/24

1 Plaintiff United States of America, by and through its counsel  
2 of record, the United States Attorney for the Central District of  
3 California and Assistant United States Attorney Valerie L. Makarewicz  
4 and Department of Justice Trial Attorney Manu J. Sebastian, and  
5 defendant JASON EDWARD THOMAS CARDIFF ("defendant"), both  
6 individually and by and through his counsel of record, Stephen G.  
7 Larson, hereby stipulate as follows:

8 1. The Indictment in this case was made public on November 27,  
9 2023. Defendant first appeared before a judicial officer of the  
10 court in which the charges in this case were pending on the same  
11 date. The Speedy Trial Act, 18 U.S.C. § 3161, originally required  
12 that the trial commence on or before February 5, 2024.

13 2. On November 27, 2023, the Court set a trial date of January  
14 23, 2024, and a status conference on January 8, 2024.

15 3. On January 11, 2024, the parties applied for a continuation  
16 of the trial date to April 23, 2024.

17 4. On January 19, 2024, the Court granted the continuation and  
18 set the date for April 23, 2024, and a status conference on April 8,  
19 2024.

20 5. Defendant is out on bond pending trial. The parties  
21 estimate that the trial in this matter will last approximately five  
22 days.

23 6. By this stipulation, defendant moves to continue the trial  
24 date to June 11, 2024, and the status conference date to May 20,  
25 2024. This is the second request for a continuance.

26 7. Defendant requests the continuance based upon the following  
27 facts, which the parties believe demonstrate good cause to support  
28 the appropriate findings under the Speedy Trial Act:

1           a.     The Government has already produced over seven and a  
2 half million documents to the defendant and intends to make the  
3 majority of its remaining discovery in the next month. Further  
4 productions are being prepared and will be disclosed to defendant on  
5 a rolling basis.

6           b.     In light of the foregoing, counsel for defendant  
7 represents that additional time is necessary to confer with  
8 defendant, conduct and complete an independent investigation of the  
9 case, conduct and complete additional legal research including for  
10 potential pre-trial motions, review the discovery and potential  
11 evidence in the case, and prepare for trial in the event that a  
12 pretrial resolution does not occur. Defense counsel represents that  
13 failure to grant the continuance would deny her reasonable time  
14 necessary for effective preparation, taking into account the exercise  
15 of due diligence.

16           c.     Defendant believes that failure to grant the  
17 continuance will deny him continuity of counsel and adequate  
18 representation.

19           d.     The government does not object to the continuance.

20           e.     The requested continuance is not based on congestion  
21 of the Court's calendar, lack of diligent preparation on the part of  
22 the attorney for the government or the defense, or failure on the  
23 part of the attorney for the Government to obtain available  
24 witnesses.

25           8.     For purposes of computing the date under the Speedy Trial  
26 Act by which defendant's trial must commence, the parties agree that  
27 the time period of April 23, 2024 to June 11, 2024, inclusive, should  
28 be excluded pursuant to 18 U.S.C. §§ 3161(h) (7) (A), (h) (7) (B) (i)

1 because the delay results from a continuance granted by the Court at  
2 defendant's request, without government objection, on the basis of  
3 the Court's finding that: (i) the ends of justice served by the  
4 continuance outweigh the best interest of the public and defendant in  
5 a speedy trial; (ii) failure to grant the continuance would be likely  
6 to make a continuation of the proceeding impossible, or result in a  
7 miscarriage of justice; and (iii)/(iv) failure to grant the  
8 continuance would unreasonably deny defendant continuity of counsel  
9 and would deny defense counsel the reasonable time necessary for  
10 effective preparation, taking into account the exercise of due  
11 diligence.

12 9. Nothing in this stipulation shall preclude a finding that  
13 other provisions of the Speedy Trial Act dictate that additional time  
14 periods be excluded from the period within which trial must commence.  
15 Moreover, the same provisions and/or other provisions of the Speedy  
16 Trial Act may in the future authorize the exclusion of additional  
17 time periods from the period within which trial must commence.

18 IT IS SO STIPULATED.

19 Dated: March 14, 2024

Respectfully submitted,

20 E. MARTIN ESTRADA  
21 United States Attorney

22 MACK E. JENKINS  
23 Assistant United States Attorney  
Chief, Criminal Division

24 /s/  
25 VALERIE L. MAKAREWICZ  
26 Assistant United States Attorney  
MANU L. SEBASTIAN  
DOJ Trial Attorney

27 Attorneys for Plaintiff  
28 UNITED STATES OF AMERICA

1 Dated: March 14, 2024

Respectfully submitted,

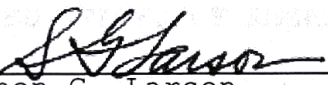
2 E. MARTIN ESTRADA  
United States Attorney

3 MACK E. JENKINS  
4 Assistant United States Attorney  
Chief, Criminal Division

5  
6 /s/  
VALERIE L. MAKAREWICZ  
7 Assistant United States Attorney  
8 MANU L. SEBASTIAN  
DOJ Trial Attorney

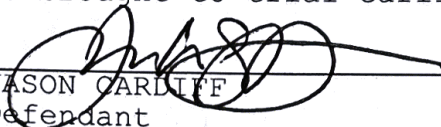
9 Attorneys for Plaintiff  
UNITED STATES OF AMERICA

10  
11 I am Jason Cardiff's attorney. I have carefully discussed every  
12 part of this stipulation and the continuance of the trial date with  
13 my client. I have fully informed my client of his Speedy Trial  
14 rights. To my knowledge, my client understands those rights and  
15 agrees to waive them. I believe that my client's decision to give up  
16 the right to be brought to trial earlier than June 11, 2024 is an  
17 informed and voluntary one.

18   
19 Stephen G. Larson  
Attorney for Defendant  
20 JASON CARDIFF

March 18, 2024  
Date

21  
22  
23 I have read this stipulation and have carefully discussed it  
24 with my attorney. I understand my Speedy Trial rights. I voluntarily  
25 agree to the continuance of the trial date, and give up my right to  
26 be brought to trial earlier than June 11, 2024.

27   
28 JASON CARDIFF  
Defendant

3/18/2024  
Date